

## **Exhibit 19**

# **SCHOOL DISTRICT/LOCAL GOVERNMENT ENTITY PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO EXCLUDE TESTIMONY OF SCHOOL DISTRICT EXPERTS**

Case No.: 4:22-md-03047-YGR

MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

**From:** [Watts, Phillip - Superintendent](#)  
**To:** [All Breathitt Employees](#)  
**Subject:** Survey (Internal Memo)  
**Date:** Friday, March 21, 2025 2:43:00 PM

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Leaders,

Our school district is embarking on a research survey to understand the experiences and challenges faced by our school personnel. The survey seeks to gather insights into professional needs and perspectives on current trends in education. You have been chosen to participate in this important survey.

Applied Marketing Science (a market research consulting firm) will be working with a third-party, Luth Research, who will contact you via email with a link to the survey, which should take no more than 10 minutes to complete. Please be on the lookout for an email from [AppliedMarketingScience@surveysavvy.com](mailto:AppliedMarketingScience@surveysavvy.com).

**What's involved?**

You will receive an email in the next few weeks from [AppliedMarketingScience@surveysavvy.com](mailto:AppliedMarketingScience@surveysavvy.com) with a link to the survey to be completed **no later than Monday, April 21st**.

We ask that you please take the time to complete this survey as it is important to our school district. We appreciate your time as we know it is valuable. Please be assured that your responses to the survey will only be used in the aggregate and will not be used as an indicator of performance.

Thanks,

Phillip Watts  
Breathitt County Schools  
Superintendent  
"Graduates Prepared For College, Career, and Community"  
#TeamBreathitt

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